

1 **LOREN S. YOUNG, ESQ.**
Nevada Bar No. 7567
2 **LINCOLN, GUSTAFSON & CERCOS, LLP**
ATTORNEYS AT LAW
3 3960 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169
4 Telephone: (702) 257-1997
Facsimile: (702) 257-2203
5 lyoung@lgclawoffice.com

6 Attorneys for Defendant, TARGET CORPORATION

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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 PATRIC LAMB,

12 Plaintiff,

13 v.

14 TARGET CORPORATION, a Foreign
15 Corporation; DOES 1-20, and ROE BUSINESS
ENTITIES 1-20,

16 Defendants.
17

CASE NO.:

**DECLARATION OF DANIEL MOORE
IN SUPPORT OF DEFENDANT
TARGET CORPORATION'S NOTICE
OF REMOVAL OF ACTION UNDER
28 U.S.C. § 1441(b) (DIVERSITY)**

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19 I, Daniel Moore, declare as follows:

- 20 1. I am employed as Director Counsel-Litigation for Target Enterprises, Inc. I am personally
21 familiar with the within stated facts and would and could testify based upon personal knowledge
22 of the same, and as to those facts stated on information and belief, I believe them to be true.
- 23 2. At all times material hereto, Target Corporation was and is incorporated in the state of
24 Minnesota.
- 25 3. At all times material hereto, Target's corporate Headquarters and Executive Officers were and
26 are located in Minneapolis, Minnesota.

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4. At all times material hereto, Target's Executive Officers and senior management, including, but not limited to, the Chief Executive Officers, Chief Operating Officer, Chief Financial Officers, Chief Legal Officer, Chief Marketing Officer, Chief Human Resources Officer, and Chief Stores Officer, were and are located at Target Headquarters in Minnesota.

5. At all times material hereto, Target's managerial and policymaking functions, including, but not limited to, finance, marketing, merchandising, legal, technology services, store operations, human resources, and property development, were and are performed at and promulgated from Target Headquarters in Minnesota.

6. At all times material hereto, Target's corporate books, records, and accounts were and are created and maintained at Target Headquarters in Minnesota.

I declare under penalty of perjury under the laws of the United States and the State of Nevada that the foregoing is true and correct, and if called upon to testify to the facts thereto, I could and would do so competently.

Executed on March 12, 2020 in Minneapolis, Minnesota.


DANIEL MOORE

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